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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

Corey Ramon Moreland, an individual; Terri L. Moreland, an individual;

Case No.: 2:24-cv-01909

Plaintiffs,

vs.

John Richard Gray, an individual; Knight Transportation, Inc., a foreign corporation; Doe Owners I-V; Doe Drivers I-V; Does I-V; and Roes I-V, inclusive,

Stipulation and Order to Extend Discovery [Second Request]

Defendants.

I. Summary of Discovery Completed

The case was removed on October 14, 2024¹. Both parties have served their disclosures, Plaintiffs on November 14, 2024, and Defendants on October 15, 2024. The Order Granting the Stipulated Discovery Plan and Scheduling Order was filed on November 25, 2024². An Order Granting Stipulation to Protect Confidential Materials and Information was filed on December 11, 2024³. Defendants served written discovery on Plaintiffs October 15, 2024, and Plaintiffs responses were served December 6, 2024. Plaintiffs served discovery on Defendants December 12, 2024, and Defendants' response are due January 21, 2025. Defendants served five (5) subpoenas for insurance records and have received the responsive documents.

¹ ECF 1.

² ECF 10.

³ ECF 13.

1 **II. Discovery Remaining**

2 Defendants are still in the process of requesting Plaintiffs' medical records and billing
3 statements. Plaintiffs will want to depose Defendants, and Defendants will want to depose Plaintiffs.
4 Plaintiffs are both currently scheduled to undergo major surgeries, which they allege are related to
5 this litigation, and will require post-op recovery time prior to Defendants taking their depositions.
6 The Parties will also need additional time to gather the surgical records and post-op care resulting
7 therefrom, and provide said records to their respective expert witnesses. Plaintiffs may depose
8 Defendant's FRCP 30(b)(6) witness. The parties will also need to take depositions of experts once
9 rebuttal experts are disclosed.

10 **III. Why the Remaining Discovery Could not be Completed**

11 The current discovery deadlines could not be met because the parties both need additional
12 time to conduct discovery on Plaintiffs prior personal injury claims and obtain records regarding
13 treatment for said claims. Defendants also require more time to collect Plaintiffs' medical records
14 as they received care from many providers. Plaintiffs are also scheduled to undergo surgeries and
15 will require post-op recovery time prior to depositions being taken. The Parties will also need
16 additional time to gather their surgical records to provide to their expert witnesses to prepare rebuttal
17 expert reports.

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1 **I. Proposed Schedule for Completing All Remaining Discovery**

| | Current Deadline | Proposed Deadline |
|--|-------------------------|--------------------------|
| Amending Pleadings and Adding Parties | January 13, 2025 | No Change |
| Initial Expert Disclosures & Interim Status Report | April 11, 2025 | No Change |
| Rebuttal Expert Disclosures | May 12, 2025 | September 9, 2025 |
| Discovery Closes | June 11, 2025 | October 9, 2025 |
| Dispositive Motions | July 11, 2025 | November 10, 2025 |
| Pre-Trial Order, if no Dispositive Motions | August 11, 2025 | December 9, 2025 |

9 **IT IS SO STIPULATED:**

11 Dated: May 8, 2025.



12 /s/ Michael Lowry

13 Michael P. Lowry, Esq.
14 Nevada Bar No. 10666
15 Kimberly A. Nelson, Esq.
16 Nevada Bar No. 15295
17 Attorneys for John R. Gray; Knight
18 Transportation, Inc.

11 Dated: May 8, 2025.

12 RALPH A. SCHWARTZ, P.C.

13 /s/ Ralph A. Schwartz

14 Ralph A. Schwartz, Esq.
15 Nevada Bar No. 5488
16 Attorneys for Corey Ramon Moreland and Terri
17 L. Moreland

18 It is so ordered.

19

20 Hon. Maximiliano D. Couvillier III

21 United States Magistrate Judge

22 Date: 5/9/2025

23 The Court notes that it is unclear whether defendants responded to plaintiff's discovery as
24 scheduled on January 21, 2025. Future stipulations should provide a more detailed
25 description of the discovery completed, and bold the discovery completed since a prior
26 extension.